

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 1:21CR00731
v.)	
)	Judge Harry D. Leinenweber
EDGAR GURROLA)	

**PROTECTIVE ORDER REGARDING
SENSITIVE SUBPOENA MATERIALS**

With the agreement of Edgar Gurrola, the United States of America, and Google LLC, the Court enters the following protective order.

1. Pursuant to Mr. Gurrola’s subpoena, Google will produce documents and other materials pertaining to the defendant and the charged offense to defense counsel. The discovery to be provided includes documents or other material that includes Google’s proprietary information, other third-party proprietary information, and other private party information, including confidential, research, development, or commercial information, other non-public financial data, and private individual data (“Google Sensitive Information”).

2. Prior to producing materials to defense counsel, Google may, in good faith, designate materials, such as documents and tangible things (including e-mail and electronic data), in this matter that contain Google Sensitive Information as “PROTECTED” and subject to this Protective Order.

3. To ensure that the Google Sensitive Information is not subject to unauthorized disclosure or misuse, IT IS HEREBY ORDERED that defense counsel of record, their investigators, assistants, and employees (collectively, “the defense team”) may review with the defendant all discovery material produced by Google, but shall not provide defendant with copies of, or permit defendant to make copies of, or have unsupervised access to, any Google Sensitive

Information, unless the sensitive material has first been entirely redacted from the discovery materials. Google and defense counsel are ordered to work together to ensure that these materials are protected, but that defendant has as much access to the materials as can be provided consistent with this Court's order. Defense counsel may also provide copies of the Google Sensitive Information to any experts retained to assist with the preparation of the defense in the captioned case.

4. Defense counsel may provide any and all discovery, regardless of whether it contains Google Sensitive Information, to the government. Documents and tangible things designated as "PROTECTED" under this Protective Order shall be used only for the purpose of this matter and shall not be used for any personal or business purpose, or in any other litigation or other proceeding, or for any other purpose, except by leave of Court. Anyone who receives discovery under this Order shall be provided a copy of this Order and shall initial and date the order reflecting their agreement to be bound by it before reviewing or possessing any documents subject to this Protective Order. This Order shall also apply to any copies made of any materials covered by this Order.

5. Upon the conclusion of all stages of this case, including any direct appellate proceedings, the defense shall destroy the materials that have been designated as "PROTECTED" under this Protective Order as well as all copies of those materials.

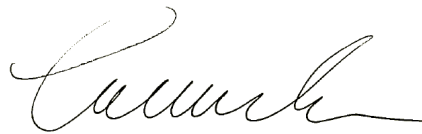
6. IT IS FURTHER ORDERED that neither defendant nor any member of the defense team shall provide any Google Sensitive Information to any third party (i.e., any person who is not a member of the defense team) other than the government or make any public disclosure of the same, other than in a court filing, without further order of this Court. If a party files a pleading that references or contains or attaches Google Sensitive Information subject to this Order, that filing

must be under seal.

7. This stipulation is without prejudice to either party applying to the Court to modify the terms of any protective order. This Court shall retain jurisdiction to modify this Order upon motion of either party even after the conclusion of district court proceedings in this case.

8. This Protective Order shall remain in full force and effect during and after the termination of this matter, whether by settlement, judgment, or other disposition or conclusion and all appeals therefrom, until modified by an Order of the Court.

ENTERED: 10/5/2022

A handwritten signature in black ink, appearing to read 'H. Leinenweber', written in a cursive style.

HARRY D. LEINENWEBER
District Court Judge
United States District Court
Northern District of Illinois